

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
The New Mexico Public Regulation)	CC Docket No. 99-200
Commission's Petition For Delegated)	
Authority To Implement Additional)	
Number Conservation Measures)	

**COMMENTS OF THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

The Public Service Commission of Wisconsin (PSCW) respectfully submits these Comments in response to the Federal Communications Commission's (Commission) Public Notice requesting comments on the New Mexico Public Regulation Commission's (NMPRC) petition for delegated authority to implement additional number conservation measures, CC Docket No. 99-200.¹ In general, the PSCW supports the delegation of authority to all states to implement mandatory thousands-block pooling at their discretion, and specifically supports the May 4, 2006, petition of the NMPRC.

The Issues

On February 24, 2006, the Commission released an order² granting the petitions of the Public Service Commission of West Virginia, the Nebraska Public

¹ New Mexico Public Regulation Commission's Petition for Delegated Authority to Implement Additional Number Conservation Measures, CC Docket No. 99-200, DA 06-1542, Rel. July 28, 2006.

² In the Matter of Numbering Resource Optimization, Order and Fifth Further Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 06-14, Rel. February 24, 2006.

Service Commission, the Oklahoma Corporation Commission, the Michigan Public Service Commission, and the Missouri Public Service Commission for delegated authority to implement mandatory thousands-block pooling.

On May 4, 2006, the NMPRC filed a similar petition with the Commission requesting delegated authority to implement mandatory thousands-block pooling in all New Mexico local number portability (LNP)-capable rate centers in an effort to extend the life of the 505 area code.

The NMPRC is currently engaged in relief planning activities for the 505 area code with the North American Numbering Plan Administration (NANPA), as this area code is forecasted to exhaust in the first quarter of 2009. The NMPRC petition indicated that out of the 163 rate centers in New Mexico, 15 have mandatory pooling, 42 have optional pooling and 106 rate centers are excluded from pooling. The NMPRC expressed concern that this situation may cause thousands of telephone numbers to be stranded in rural rate centers and may be contributing to the premature exhaust of the 505 area code. The NMPRC indicated that delegated authority to implement mandatory thousands-block pooling may help to extend the life of the 505 area code as well as to delay the expense and inconvenience of additional relief planning measures for the residents of New Mexico.

The PSCW Supports the Delegation of Authority to New Mexico to Implement Mandatory Thousands-Block Pooling at Its Discretion

Throughout the history of the Commission's number resources optimization docket

(CC Docket No. 99-200), the Commission has encouraged and taken steps to implement conservation measures to preserve the valuable and finite resource of telephone numbers. Thousands-block pooling is a proven conservation tool and a delegation to New Mexico to implement mandatory pooling as a means to prolong the life of the 505 area code complements past Commission actions and likely results in no harm to providers.

Like many states, Wisconsin is facing further area code exhausts in the future. Avoidance of area code relief is not realistic in many instances; however, the postponement of the need for relief is of benefit to both customers and providers alike. Conservation efforts that can achieve that postponement are thus valuable. Number pooling is a very real and effective tool in this regard.

Conclusion

The authority to implement appropriate and necessary steps in order to conserve number resources should be available to all state commissions. Until then, the PSCW urges the Commission to approve the New Mexico petition for delegated authority to implement additional number conservation measures in an effort to extend the life of the 505 area code.

Dated at Madison, Wisconsin, _____

By the Commission

Sandra J. Paske
Secretary to the Commission

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